

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)

GREG ABBOTT, *et al.*,

Defendants.

**PRIVATE PLAINTIFFS' OPPOSED MOTION FOR
MODIFICATION OF THE DEADLINE FOR FILING MOTIONS FOR
ATTORNEYS' FEES, EXPENSES, AND COSTS**

Private Plaintiffs submit this motion for modification of the date by which motions for attorneys' fees, expenses, and costs relating to this case must be filed. On May 8, 2018, on unopposed motion of the parties, the Court entered an order postponing the deadline for filing and briefing any motions for attorneys' fees, expenses, and costs relating to this case until 45 days after the time for any party to seek further appellate review of this Court's August 23, 2017 Order has lapsed, 45 days after the final disposition of any further appellate review of the Court's August 23, 2017 Order, or 45 days after entry of a final judgment by this Court, whichever is later. Order (Dkt. 1101).

Since the time the Court entered that Order, Texas filed a Motion to Dismiss (Dkt. 1107), which evidences a dispute amongst the parties as to whether a final judgment had been entered in this matter. In order to ensure that there is no ambiguity as to the date by which fee applications must be filed, Private Plaintiffs propose, without prejudice to any position taken by any party on Defendants' pending Motion to Dismiss, that the Court's prior order be modified as follows:

Any motion for attorneys' fees, expenses, and costs relating to this case will be filed no later than February 28, 2019, unless proceedings in this case are pending before any court on or after January 14, 2019, in which case the deadline for filing any motion for attorneys' fees, expenses, and costs shall be adjourned until further order of the Court. This order is without prejudice to any position taken by any party on the Motion to Dismiss (Dkt. 1107) pending before the Court.

The United States has indicated that it takes no position on this motion. Defendants have indicated that they will not consent to this motion.

Date: August 31, 2018

Respectfully submitted,

/s/ Lindsey B. Cohan

JON M. GREENBAUM
EZRA D. ROSENBERG
BRENDAN B. DOWNES
Lawyers' Committee for
Civil Rights Under Law
1401 New York Avenue NW Suite 400
Washington, D.C. 20005

WENDY WEISER
MYRNA PÉREZ

The Brennan Center for Justice at NYU Law School
120 Broadway, Suite 1750
New York, New York 10271

SIDNEY S. ROSDEITCHER
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, New York 10019-6064

LINDSEY B. COHAN
Dechert LLP
500 W. 6th Street, Suite 2010
Austin, Texas 78701

NEIL STEINER
DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036-6797

JOSE GARZA
Law Office of Jose Garza
7414 Robin Rest Drive
San Antonio, Texas 98209

DANIEL GAVIN COVICH
Covich Law Firm LLC
802 N Carancahua, Ste 2100
Corpus Christi, Texas 78401

GARY BLEDSOE
Potter Bledsoe, LLP
316 W. 12th Street, Suite 307
Austin, Texas 78701

VICTOR GOODE
NAACP
4805 Mt. Hope Drive
Baltimore, Maryland 21215

ROBERT NOTZON
The Law Office of Robert Notzon
1502 West Avenue
Austin, Texas 78701

*Counsel for the Texas State Conference of NAACP
Branches and the Mexican American Legislative
Caucus of the Texas House of Representatives*

/s/ Leah Aden
SHERRILYN IFILL
JANAI NELSON
LEAH C. ADEN
DEUEL ROSS
NAACP Legal Defense and Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006

JONATHAN PAIKIN
KELLY P. DUNBAR
TANIA FARANSSO
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006

Counsel for Imani Clark

/s/ Chad W. Dunn

CHAD W. DUNN
K. SCOTT BRAZIL
BRAZIL & DUNN
4201 Cypress Creek Pkwy., Suite 530
Houston, Texas 77068

J. GERALD HEBERT
DANIELLE M. LANG
Campaign Legal Center
1411 K Street NW Suite 1400
Washington, DC 20005

ARMAND G. DERFNER
Derfner & Altman
575 King Street, Suite B
Charleston, S.C. 29403

NEIL G. BARON
Law Office of Neil G. Baron
914 FM 517 W, Suite 242
Dickinson, Texas 77539

DAVID RICHARDS
Richards, Rodriguez & Skeith, LLP
816 Congress Avenue, Suite 1200
Austin, Texas 78701

Counsel for Veasey/LULAC Plaintiffs

LUIS ROBERTO VERA, JR.
Law Office of Luis Roberto Vera Jr.
111 Soledad, Ste 1325
San Antonio, TX 78205

Counsel for LULAC

/s/ Rolando L. Rios

ROLANDO L. RIOS
115 E. Travis, Suite 1645
San Antonio, Texas 78205

*Counsel for the Texas Association of Hispanic
County Judges and County Commissioners*

/s/ Robert W. Doggett
ROBERT W. DOGGETT
SHOSHANA J. KRIEGER
Texas RioGrande Legal Aid
4920 N. IH-35
Austin, Texas 78751

JOSE GARZA
Texas RioGrande Legal Aid
1111 N. Main Ave.
San Antonio, Texas 78212

*Counsel for Lenard Taylor, Eulalio Mendez Jr.,
Lionel Estrada, Estela Garcia Espinoza, Margarito
Martinez Lara, Maximina Martinez Lara, and La
Union Del Pueblo Entero, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2018, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Lindsey B. Cohan

Lindsey B. Cohan
Dechert LLP
300 W. 6th Street, Suite 2010
Austin, Texas 78731
lindsey.cohan@dechert.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)

GREG ABBOTT, *et al.*,

Defendants.

**[PROPOSED] ORDER ON PRIVATE PLAINTIFFS' MOTION FOR
MODIFICATION OF THE DEADLINE FOR FILING MOTIONS FOR
ATTORNEYS' FEES, EXPENSES, AND COSTS**

Pending before the Court is Private Plaintiffs' Motion for Modification of the Deadline for Filing Motions for Attorneys' Fees, Expenses, and Costs. For good cause shown, the Motion is hereby GRANTED.

It is hereby ordered that any motion for attorneys' fees, expenses, and costs relating to this case will be filed no later than February 28, 2019, unless proceedings in this case are pending before any court on or after January 14, 2019, in which case the deadline for filing any motion for attorneys' fees, expenses, and costs shall be adjourned until further order of the Court. This order is without prejudice to any position taken by any party on the Motion to Dismiss (Dkt. 1107) pending before the Court.

So ORDERED this ____ day of September, 2018.

The Honorable Nelva Gonzales Ramos
United States District Judge